

REMARKS

Pursuant to 37 C.F.R. § 1.111(a)(2), Applicants respectfully request entry of this Supplemental Amendment. An amendment, along with a Request for Continued Examination, was filed on October 31, 2007 in response to a Final Office Action mailed from the U.S. Patent and Trademark Office on October 3, 2007 in the above-identified application. In that amendment, claims 1-4, 6, 8, 11-21 and 35-44 were amended and claims 5, 9, 10, 22-34 and 45-62 were canceled. Subsequently on December 20, 2007, the undersigned attorney for the Applicants conducted a telephonic interview with Examiner Chandler and Examiner Patel regarding claims 1 and 21 in view of the prior art of record. This Supplemental Amendment further amends the claims of the present application according to suggestions from the Examiners to place the claims in condition for allowance.

Claims 1-21 and 35-44 stand rejected. Claims 1, 2, 4 and 21 have been further amended. No new matter has been added. The Applicants respectfully request reconsideration in view of the foregoing amendments.

Miscellaneous Claim Amendments

Claims 2 and 4 have been amended for proper antecedent basis. No new matter is introduced by these amendments.

Claim Rejections - 35 U.S.C. § 103

Claims 1-20 and 35-44 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,269,346 ("Cristofich") in view of U.S. Patent 5,692,233 ("Garman"). Claim 21 was rejected as obvious over Cristofich.

Claim 1 as now amended recites a finance system supporting a plurality of different types of employee stock plans that comprises a processor coupled to memory that comprises volatile data storage. The processor executes instructions to (i) communicate with a plurality of remote administration system modules. Each of the remote administration system modules comprises non-volatile data storage to store a plurality of master brokerage accounts. Each of the plurality of master brokerage accounts comprises individual participant information in at least one of the plurality of different types of employee stock plans. The processor further executes instructions

to (ii) receive, from each of the plurality of remote administration system modules, a plurality of limited brokerage accounts, each of which comprises a subset of the individual participant information from a corresponding master brokerage account, (iii) store the plurality of limited brokerage accounts in the volatile data storage of the finance system, (iv) present an interface system module through which a participant accesses participant information in a limited brokerage account and through which the participant interacts with a trading system to conduct individual participant transactions on a public exchange, (iv) update the participant information of the limited brokerage account in the volatile data storage according to the individual participant transactions conducted by the participant, and (v) transmit the participant information updated in the limited brokerage account to a corresponding master brokerage account stored in the non-volatile data storage of a corresponding one of the plurality of remote administration system modules. Claim 21 recites similar features. Support for these features can be found at least in FIG. 1 and in the specification as originally filed on page 3, lines 7-27; page 6, line 27 to page 7, line 21; page 7, line 29 to page 8, line 6; page 9, line 20 to page 10, line 25; page 12, lines 8-19; page 12, line 24-33; page 13, lines 9-33; page 14, lines 8-21 and page 15, line 5-9).

As discussed in the specification, complicated systems and methods were known for implementing employee stock plans. However, such systems and methods required a concomitant full-service brokerage account or real-time access to employee demographic information. As a result, such systems handled both individual participant transactions in employee stock plans as well as administrative management of participant and sponsor information in such plans. In accordance with the claimed invention, performance of the individual participant transactions and administrative management are separated and performed by a finance system and a plurality of remote administration system modules, respectively. The finance system, as claimed, stores limited brokerage accounts to conduct individual participant transactions. Each of the limited brokerage accounts includes a subset of participant information periodically received from a corresponding master brokerage accounts maintained in non-volatile storage of a corresponding remote administration system module. The finance system can conduct individual participant transactions using a limited brokerage account including a subset of the participant information necessary to effect such transactions, without being burdened with additional management tasks, such as adding, maintaining and updating participant and sponsors

information, which is performed by the plurality of remote administration system modules. Accordingly, an unlimited number of client companies can be accommodated through the use of a finance systems and a plurality of remote administration system modules. (See also page 14, lines 8-21 and page 7, line 29 to page 8, line 6 of the specification as originally filed).

In contrast, Cristofich discusses a system and method of managing stock option accounts for a participants of a particular stock option plan. Referring to FIG. 1 of Cristofich, all participant information is stored, access and maintained in a client participant database 20. (see Cristofich: Fig. 1, col. 3, line 66 to col. 4, line 9; col. 5, lines 47-57; and col. 8, lines 47-54). Thus, Cristofich fails to teach or suggest at least the steps of, or structure for, (i) receiving, from each of a plurality of remote administration system modules, a plurality of limited brokerage accounts, each of the limited brokerage accounts comprising a subset of the individual participant information from a corresponding master brokerage account and (ii) storing the plurality of limited brokerage accounts in the volatile data storage of the finance system.

For the same reason, Cristofich also fails to teach or suggest (i) presenting an interface system module through which a participant accesses participant information in a limited brokerage account and through which the participant interacts with a trading system to conduct individual participant transactions on a public exchange, (ii) updating the participant information of the limited brokerage account in the volatile data storage according to the individual participant transactions conducted by the participant, and (iii) transmitting the participant information updated in the limited brokerage account to a corresponding master brokerage account stored in the non-volatile data storage of a corresponding one of the plurality of remote administration system modules.

Garman does not correct the deficiencies of Cristofich. Garman merely discusses an integrated system and method for a user unsophisticated in computer programming or simulation techniques to rapidly execute financial Monte Carlo simulations on complex financial securities without use of intermediaries. (See Garman: col. 2, lines 13-18).

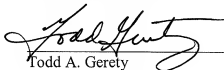
For at least these reasons, claims 1 and 21 are patentable as they are neither anticipated or obvious in view of the cited art of record.

Furthermore, by virtue of at least their dependency upon claims 1 and 21 and the additional features recited therein, claim 2-4, 6-8, 11-20 and 35-44 are also patentable.

CONCLUSION

In view of the above amendments and remarks, it is believed that claims 1-4, 6-8, 11-21 and 35-44 are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,



Todd A. Gerety
PTO Reg. 51,729
Attorney for the Applicant
Proskauer Rose LLP
One International Place
Boston, MA 02110

Date: January 4, 2008

Tel. (617) 526-9655
Fax (617) 526-9899